

## **Item 1 – Cover Page**

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Registered As: RetireRight, LLC | Doing Business as: RetireRight Consulting Group



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### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 26, 2020**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of RetireRight (“the firm”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (866) 379-4015 or through the firm’s web site: [www.uretireright.com](http://www.uretireright.com).

The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about the firm to assist you in determining whether to retain the firm.

Additional information about RetireRight and its the Control Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD number 300925.

## **Item 2 – Material Changes**

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Annually, a complete Disclosure Brochure will be offered to clients along with a summary of material changes, if any, within 120 days from the firm's fiscal year-end.

There were no material changes made to this brochure since the last published version which was dated September 18, 2019.

At any time, the current Disclosure Brochure is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the firm name or CRD number 300925. A copy of this Disclosure Brochure may be requested at any time, by contacting (866) 379-4015 or through the firm's website: [www.uretireright.com](http://www.uretireright.com).

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## **Item 4 – Advisory Services**

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### **Firm Information**

RetireRight is a full-service retirement plan consulting group with a team of industry professionals, each with more than 25 years of industry experience. Being both vendor and investment neutral, our function is to serve as true independent consultants. We bring our clients advice, innovative design ideas, sophisticated guidance, and experience-backed recommendations.

RetireRight provides investment and retirement plan consulting services to corporations, government entities, non-profit organizations and individuals. We help fiduciaries seek protection from the personal and corporate liability related to the retirement plan, while aiming to enhance potential investment opportunities and ultimately helping participants work toward financial security. In helping plan sponsors deliver high quality retirement programs we help contain costs, address regulatory requirements, and promote an independent prudent process.

The firm was founded on the belief that a retirement plan serves a true purpose to participants and the organization. The firm is employee-centric and committed to creating an exceptional retirement plan experience.

### **Executive Management Team**

#### **Brian R. Ormord, Managing Member**

Focusing on employers and retirement planning since 1990, Brian started his career working for one of the 401(k) industry's leading retirement plan providers. Brian has been securities registered since September of 1994.

Mr. Ormord earned the Chartered Retirement Plans Specialist® (CRPS®) designation from The College for Financial Planning. In 2005, Brian completed the Accredited Investment Fiduciary® (AIF®) program through the Center for Fiduciary Studies. This designation along with the education received and commitment to the AIF® ethical policy has prepared Brian to assist plan sponsors with the selection and ongoing monitoring of the investment offerings in their plan. In many cases, Brian can serve as a 3(21) fiduciary to the plan. He earned the Professional Plan Consultant™ designation, also from the Center for Fiduciary Studies. He holds the FINRA Series 6, 7, 63 and 66 registrations.

Mr. Ormord also provides investment services to customers of Premier Bank and maintains an office at a branch location, additional details are provided in his individual disclosure brochure (ADV 2B).

#### **Henry (Dan) Kinney, Managing Member**

Mr. Kinney started in the Financial Services business on September 1st 1987, the third generation of his family to do so and is dedicated to developing and implementing processes for his clients that work towards improving personal and corporate retirement plans. He holds the FINRA 6, 7, and 63 registrations. Dan has worked with one of the nation's leading pension companies. He is also an Accredited Investment Fiduciary® (AIF®). Dan works with his clients as an ERISA 3(21) Co-fiduciary, and is always seeking out new ways to improve his clients' experience.

A 1986 Graduate of the University of Iowa, and a 1984 Graduate of New Mexico Military Institute. He served as an Officer in the Iowa National Guard, 1/133rd, as an Infantry Platoon Leader, Company Commander and Battalion Staff Officer. In 1991 Dan spent the year in Moscow, Russia as the head of a trade organization between Iowa and Russia called JB DeMos. He is also a graduate of the Greater Des

Moines Leadership Institute and was awarded the '40 under 40' designation by the Des Moines Business Record.

### **Dirk M. Dixon, Managing Member**

Mr. Dixon is an Enrolled Agent (EA) with a license to practice directly from the IRS and the United States Treasury and an Accredited Investment Fiduciary® (AIF®). After making the Deans' List every semester at Grand View College, he graduated in 1997 with a Bachelors of Business Administration. He holds the FINRA 6,63 and 65. Dirk is a member of the Iowa Board of Accountancy. The state board is the only body that can revoke a license to practice. State boards are not affiliated with any trade association. Board members, both drawn from the accounting profession and others, are appointed to serve by the Governor. State boards of accountancy have disciplinary and enforcement powers over licensees and operate on a complaint-based system.

### **Richard (Rick) Gromis, Chief Compliance Officer (CCO)**

Mr. Gromis serves in the capacity of Chief Compliance Officer as an employee of Good Life Outsourced Compliance, LLC (GLOC). GLOC is team-based outsourced compliance solution that provides services from a remote location using custom designed technology resources. A member of the GLOC team makes periodic on site inspections of the firms offices.

Mr. Gromis holds a Bachelor of Science Degree in Economics and Business Administration from Lebanon Valley College in Annville, PA. Prior to becoming a GLOC employee, Mr. Gromis served as the Chief Compliance Officer for Good Life the firms, LLC, an SEC registered investment advisor with over a billion dollars of assets under management. He also spent 38 years in the banking industry in such positions as Senior Lender, Bank Director, Chief Compliance Office and Chief Operations Officer as well as the Founder and President of Berkshire Bank. In addition, Mr. Gromis has been involved in numerous charitable organizations over the years. He has held leadership positions with the Boy Scouts, Berks County (PA) Association for the Blind and a trustee of the Exeter Township Library. Mr. Gromis has also been a Rotarian for more than 35 years and has served as Rotary Club President, Assistant District Governor and District Governor.

### **Services Offered**

Services are provided primarily to corporations, government entities, non-profit organizations and individuals by providing regular and continuous management and supervision of assets as well as providing financial planning services. Assets are managed with a focus on investment goals, objectives, risk tolerance and financial situation. Investment portfolios consist of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs") as well as individual stocks, bonds, margin, shorts, alternative investments, and/or options contracts as appropriate. The firm's investment strategy[ies] is primarily long-term focused, but the firm may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions.

- At no time will the firm accept or maintain custody of funds or securities. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement. Please see Item 12 – Brokerage Practices and Item 15 - Custody.
- Investment advisor representatives provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, real estate investment trusts ("REITs"), equities, and fixed income securities.

- The advice is tailored to the individual needs of the client based on the investment objective chosen by the client in order to help assist clients in attempting to meet their financial goals.
- Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's investment profile. More specific account information and acknowledgements are further detailed in the account opening documents.
- Investment advisor representative can assist a client in identifying a third-party portfolio manager. The Portfolio Manager manages client's assets on a discretionary basis.
  - The firm will provide initial and ongoing assistance regarding the Portfolio Manager selection process.
  - The client can authorize the Portfolio Manager to act on a discretionary basis to purchase, sell and rebalance the account holdings.

A minimum account value of \$5,000 to \$250,000 is generally required to open an account depending on the particular platform selected. Additional platform details and platform specific disclosure brochures are provided as part of the account opening process.

### **Small Market Solution (SMS) Program**

Under SMS, LPL Research (a team of investment professionals within LPL) creates and maintains a series of different investment menus ("Investment Menus") consisting of a mix of different asset classes and investment vehicles ("investment options") for clients that sponsor and maintain participant-directed defined contribution plans ("Plan Sponsors"). The Plan Sponsor is responsible for selecting the Investment Menu that it believes is appropriate based on the demographics and other characteristics of the Plan and its participants. broker/dealer Research is responsible for the selection and monitoring of the investment options made available through Investment Menus ("Fiduciary Selection Services"). The investment options that are offered through SMS are limited to the specific investments available through the record keeper that the Plan Sponsor selects. The Plan Sponsor may only select an Investment Menu in its entirety and does not have the option to remove or substitute an investment option.

- If the Plan is subject to ERISA, broker/dealer will be a "fiduciary" and serve as "investment manager" (as that term is defined in section 3(38) of ERISA) in connection with the Fiduciary Selection Services. None of the services offered under SMS other than the Fiduciary Selection Services will constitute "investment advice" under 3(21)(A)(ii) of ERISA, or otherwise cause broker/dealer or the firm to be deemed a fiduciary.

In addition to the Fiduciary Selection Services, Plan Sponsor may also select from a number of non-fiduciary consulting services available under SMS that are provided by the firm. These consulting services may include, but are not limited to: general education, and support regarding the Plan and the investment options selected by Plan Sponsor; assistance regarding the selection of, and ongoing relationship management for, record keepers and other third-party vendors; Plan participant enrollment support; and participant-level education regarding investment in the Plan. These consulting services do not include any individualized investment advice to the Plan Sponsor or Plan participants with respect to Plan assets, the firm does not act as fiduciaries under ERISA in providing such consulting services.

## Guided Wealth Portfolios (GWP)

GWP offers clients the ability to participate in a centrally managed, algorithm-based investment program, which is made available to users and clients through a web-based, interactive account management portal ("Investor Portal"). Investment recommendations to buy and sell open-end mutual funds and exchange-traded funds are generated through proprietary, automated, computer algorithms (collectively, the "Algorithm") of Xulu, Inc., doing business as Future Advisors ("Future Advisors"), based upon model portfolios constructed by LPL and selected for the account as described below (such model portfolio selected for the account, the "Model Portfolio"). Communications concerning GWP are intended to occur primarily through electronic means (including but not limited to, through email communications or through the Investor Portal), although the firm will be available to discuss investment strategies, objectives or the account in general in person or via telephone.

Within the applicable allocation track and based upon a client's chosen Retirement Age in the Client Profile, the client will be assigned a Model Portfolio and one of five of broker/dealer's standard investment objectives:

- **Income with capital preservation.** Designed as a longer-term accumulation account, this investment objective is considered generally the most conservative. Emphasis is placed on generation of current income with minimal risk of capital loss. Lowering the risk generally means lowering the potential income and overall return.
- **Income with moderate growth.** This investment objective emphasizes generation of current income with a secondary focus on moderate capital growth.
- **Growth with income.** This investment objective emphasizes modest capital growth with some focus on generation of current income.
- **Growth.** This investment objective emphasizes achieving high long-term growth and capital appreciation. There is little focus on generation of current income.
- **Aggressive growth.** This investment objective emphasizes aggressive growth and maximum capital appreciation, with no focus on generation of current income. This objective has a very high level of risk and is for investors with a longer timer horizon.

Both the client and the firm are required to review and approve the initial Investment Objective. As a client approaches the Retirement Age, the Algorithm will automatically adjust the client's asset allocation. Any change to the Investment Objective directed by a client due to changes in the Client's risk tolerance and/or Retirement Age will require written approval from the client and the firm before implementation. Failure to approve the change in Investment Objective may result in a client remaining in a Model Portfolio that is no longer aligned with the applicable Client Profile. The Investment Objective selected for the account is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time and may be inconsistent with other asset allocations suggested to client by broker/dealer, the firm or Future Advisors prior to client entering into the Account

Agreement. The terms and conditions for client participation in the advisory programs are set forth in the firm's advisory agreements and account paperwork for the advisory programs.

### **Retirement Plan Consulting Services**

Investment advisor representatives assist clients that are trustees or other fiduciaries to retirement plans ("Plans") by providing fee-based consulting and/or advisory services. Investment advisor representatives perform one or more of the following services, as selected by the client in the client agreement:

- Assistance in the preparation or review of an investment policy statement ("IPS") for the Plan based upon consultation with client to ascertain Plan's investment objectives and constraints.
- Acting as a liaison between the Plan and service providers, product sponsors or vendors.
- Ongoing monitoring of investment manager(s) or investments in relation to the criteria specified in the Plan's IPS or other written guidelines provided by the client to the IAR.
- Preparation of reports describing the performance of Plan investment manager(s) or investments, as well as comparing the performance to benchmarks.
- Ongoing recommendations for consideration and selection by client about specific investments to be held by the Plan or, in the case of a participant-directed defined contribution plan, to be made available as investment options under the Plan.
- Training for the members of the Plan Committee with regard to their service on the Committee, including education and consulting with respect to fiduciary responsibilities.
- Assistance in enrolling Plan participants in the Plan, including conducting an agreed upon number of enrollment meetings. As part of such meetings, Representatives may provide participants with information about the Plan, which includes information on the benefits of Plan participation, the benefits of increasing Plan contributions, the impact of pre-retirement withdrawals on retirement income, the terms of the Plan and the operation of the Plan.
- Assistance with investment education seminars and meetings for Plan participants. Such meetings may be on a group or individual basis, and includes information about the investment options under the Plan (e.g., investment objectives, risk/return characteristics, and historical performance), investment concepts (e.g., diversification, asset classes, and risk and return), and how to determine investment time horizons and assess risk tolerance. Such meetings do not include specific investment advice about investment options under the Plan as being appropriate for a particular participant.
- Assistance at client's direction in making changes to investment options under the Plan.
- Assistance with the preparation, distribution and evaluation of Request for Proposals, finalist interviews, and conversion support in connection with vendor analysis and service provider support.



- Preparation of comparisons of Plan data (e.g., regarding fees and services and participant enrollment and contributions) to data from the Plan's prior years and/or a benchmark group of similar plans.
- Assistance in identifying the fees and other costs borne by the Plan for, as specified by client, investment management, recordkeeping, participant education, participant communication and/or other services provided with respect to the Plan.
- Non-Discretionary Model Portfolios. IAR will recommend, for consideration and approval by Client, (i) asset allocation target-date or risk-based model portfolios for the Plan to make available to Plan participants, and (ii) funds from the line-up of investment options chosen by the Client to include in such model portfolios.

If the Plan makes available publicly traded employer stock ("company stock") as an investment option under the Plan, Representatives do not provide investment advice regarding company stock and are not responsible for the decision to offer company stock as an investment option. In addition, if participants in the Plan invest the assets in their accounts through individual brokerage accounts, a mutual fund window, or other similar arrangement, or obtain participant loans, IARs do not provide any individualized advice or recommendations to the participants regarding these decisions. Furthermore, IARs do not provide individualized investment advice to Plan participants regarding their Plan assets.

If a client elects to engage the firm and our Investment Advisor Representatives to perform ongoing investment monitoring and ongoing investment recommendation services in the client agreement, such services will constitute "investment advice" under Section 3(21)(A)(ii) of ERISA. Therefore, the firm and our IAR will be deemed a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of ERISA in connection with those services. Clients should understand that to the extent the firm and our IARs are engaged to perform services other than ongoing investment monitoring and recommendations, those services are not "investment advice" under ERISA, and therefore, the firm and our IARs will not be a "fiduciary" under ERISA with respect to those other services.

### **Retirement Plan Rollovers**

An employee generally has four (4) options for their retirement plan when they leave an employer:

1. Leave the money in his/her former employer's plan, if permitted
2. Rollover the assets to his/her new employer's plan, if one is available and permitted
3. Rollover to an Individual Retirement Account (IRA), or
4. Cash out the account value, which has significant tax considerations

The firm provides educational services pertaining to retirement plan assets that could potentially be rolled-over to an IRA managed by the firm. Education is based on a particular client's financial circumstances. The firm has an incentive to recommend such a rollover based on the compensation received, which is mitigated by the fiduciary duty to act in a client's best interest and acting accordingly.

### **ERISA Fiduciary**

Such services provided as an IAR are subject to the Investment Advisers Act of 1940 ("Advisers Act"), and the advisor is a fiduciary under the Advisers Act with respect to such services. In addition, if client elects to engage an IAR to perform ongoing investment monitoring and ongoing investment recommendation services to a Plan subject to ERISA in the client agreement, such services will constitute "investment advice"

under Section 3(21) or 3(38) of ERISA. Therefore, the IARs will be deemed a “fiduciary” as such term is defined under Section 3(21) or 3(38) of ERISA in connection with those services. Clients should understand that to the extent the investment advisor representative is engaged to perform services other than ongoing investment monitoring and recommendations, those services are not “investment advice” under ERISA and therefore, the investment advisor representative will not be a “fiduciary” under ERISA with respect to those other services.

From time to time the IAR may make the Plan or Plan participants aware of and may offer services available from IAR that are separate and apart from the services provided under Retirement Plan Consulting. Such other services may be services to the Plan, to a client with respect to client's responsibilities to the Plan and/or to one or more Plan participants. In offering any such services, the investment advisor representative is not acting as a fiduciary under ERISA with respect to such offering of services. If any such separate services are offered to a client, the client will make an independent assessment of such services without reliance on the advice or judgment of the IAR.

### **RetireRight Wrap Fee Program**

The firm offers SWM II as a wrap fee program where the firm acts as the sponsor and portfolio manager.

- A wrap fee program is a comprehensive advisory account with a single fee that covers a bundle of services; such as, portfolio management, advice, and investment research as well as trade execution, custody and reporting fee.
- Please see Appendix 1 –Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure. The advisory fee for the Wrap Fee Program to account for the transaction fees.

Depending on the anticipated level of trading, investment advisor representatives of the firm will work with each client to determine the most cost-effective fee structure.

### **Third Party Advisory Services**

The firm can establish agreements with third-party advisors. Any such third-party investment adviser will be properly registered in the applicable state jurisdiction or with the SEC. The firm will receive compensation pursuant to any such agreement.

Clients who are referred to third-party investment advisers will receive full disclosure, including services rendered and fee schedules. Clients will be required to enter into an advisory agreement and complete other account specific documents with the third-party investment advisor in order to establish an account. The firm will assist in determining an appropriate third-party adviser but does not participate in the actual management of account.

### **Financial Planning Services**

The firm through its investment advisor representatives generally provides financial planning as part of a comprehensive asset management engagement. However, financial planning is available separately for a separate fee. The type of plan can vary greatly depending on the scope and complexity of a particular individual's financial situation but may include:

## Planning Strategies for Families and Individuals

- **Retirement** – planning an investment strategy with the objective of providing inflation-adjusted income for life.
- **College / Education** – planning to pay the future college / education expenses of a child or grandchild.
- **Insurance Needs** – planning for the financial needs of survivors to satisfy such financial obligations as housing, dependent child care and spousal arrangements as well as education.
- **Estate Planning** – planning that focuses on the most efficient and tax friendly option to pass on an estate to a spouse, other family members or a charity.
- **Cash Flow/ Budget Planning** – planning to manage expenses against current and projected income.
- **Wealth Accumulation** – planning to build wealth within a portfolio that takes into consideration risk tolerance and time horizon.
- **Tax Planning** – planning a tax efficient investment portfolio to maximize deductions and off-setting losses.
- **Investment Planning** – planning an investment strategy consistent with a particular objectives, time horizons and risk tolerances.
- **Inheritance Planning** – planning for a tax efficient method to pass wealth to the next generation.

## Planning Strategies for Businesses

- **Business Entity Planning** – review the various forms of business structures in relation to liability and income tax considerations.
- **Qualified Retirement Plans** – evaluate the types of retirement plans established by an employer for the benefit of the company's employees.
- **Stock Option Planning** – planning to maximize the value of employer issued stock options and optimize what to exercise and what to hold.
- **Key Person Planning** – evaluate the life insurance needs required in the event of the sudden loss of a key executive in order to buy time to find a new person or to implement other strategies to continue the business.
- **Executive Benefits** – planning to attract, reward and retain top executive talent.
- **Deferred Compensation Plans** – planning for the use of tax deferred funds to be withdrawn and taxed at some point in the future.

- **Business Succession Planning** – planning for the continuation of a business after key executives move on to new opportunities, retire or pass away with the use of buy-sell agreements, key-man insurance and engaging independent legal counsel as needed.

Prior to engaging the firm to provide stand-alone planning or consulting services, clients are required to enter into a Financial Planning and Consulting Agreement setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to the firm commencing services. If requested by the client, the firm may recommend the services of other professionals for implementation purposes, including our IARs in their individual capacities as registered representative of LPL Financial and as licensed insurance agents (“Recommended Professional”).

### **Client Account Management**

Prior to an engagement each client is required to enter into an agreement that defines the terms, conditions, and fees.

### **Assets Under Management**

The assets under management as of September 05, 2019 are as below. The assets under management shall be amended following the firm’s fiscal year-end (December). Clients may request more current information at any time by contacting the firm.

Assets under Management	
Discretionary	\$72,346,833
Non-Discretionary	\$383,752,467
Total	<b>\$456,099,300</b>

## **Item 5 – Fees and Compensation**

### **Fees for Advisory Services**

Investment advisory fees are paid monthly, quarterly or as agreed in advance or in arrears pursuant to the terms of the investment advisory agreement. Fees are based on the market value of assets under management at the end of the prior calendar month or quarter or the daily average as agreed in the advisory agreement. Investment advisory fees are based on the scope and complexity of an account the degree of expertise required and the amount or time required but generally do not exceed an annualized rate of 1.5%.

The investment advisory fee in the first period of service is prorated from the inception date of the account[s] to the end of the first month or quarter depending on the fee schedule agreement. The Client’s fees will take into consideration the aggregate assets under management with the firm. All securities held in accounts will be independently valued by the designated custodian. The firm will not have the authority or responsibility to value portfolio securities.

- If a client terminates an engagement prior to the period, a pro-rated fee calculation will be applied prior to releasing the funds.
- The firm’s fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses.

### **Mutual Fund Share Class Disclosures**

Certain mutual fund share classes charge a 12b-1 fee that generally amounts to an additional .25% expense ratio or more. The purpose of 12b-1 fees, as approved by the SEC, are to cover marketing expenses and shareholder services such as support services and “other expenses” such as the legal, accounting and the administrative services. When selecting a mutual fund, there is a fiduciary duty to select the share class that helps manage the overall fee structure of the account. The overall fee structure includes such fees as the asset management fee, expense ratio and ticket charges.

- Mutual funds normally offer multiple share classes, including lower-cost share classes that do not charge 12b-1 fees and are therefore usually less expensive.
- Investment adviser representatives may or may not invest or hold client funds in 12b-1 fee paying share classes as appropriate to account for the overall fee structure and tax considerations of an account.

Depending on the anticipated trading volume, and the asset management fee that is determined based on account size, complexity and time requirements, investment advisor representatives have a fiduciary duty to determine the mutual fund share class that is in the best interest of each client as part of the overall fee analysis.

The overall fee structure includes such fees as:

- Asset Management Fee
- Expense ratio
- 12b-1 fees
- Trade Ticket Charges

Investment advisor representatives will consider investing client funds in 12b-1 fee paying share classes even when a lower-cost share class is available as appropriate to account for the overall fee structure of the account and client profile.

- A share class that pays 12b-1 fee usually does not have transaction charges.
- Not all investors will qualify for all share classes
- Not all share mutual funds offered equivalent share classes.
- 12b-1 fees are retained by LPL Financial, an unaffiliated member FINRA/SIPC broker/dealer.
- LPL Financial does not share 12b-1 fees with individual investment advisor representatives in their independent capacity as registered representatives of LPL Financial.

### **Fee Billing**

#### **Investment Management Services**

Investment advisory fees are calculated by the custodian and deducted from the Client's account[s] by the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the

total assets under management with the firm at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting the firm to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### **Financial Planning Services**

We charge on an hourly or flat fee basis for financial planning services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you.

- Financial plans that are based on an hourly rate they generally range from \$250 to \$500 an hour based on the scope, level of complexity and level of expertise required. An hourly rate that exceeds \$500 an hour is subject to approval by the Chief Compliance Officer.
- Financial plans that are based on a flat rate generally range from \$500 to \$5,000 based on the scope, complexity and level of expertise required. A flat fee that exceeds \$5,000 is subject to approval by the Chief Compliance Officer.

### **Hourly Consulting Services**

The firm charges an hourly fee of \$250 to \$500 to provide hourly consulting when a more comprehensive financial plan is not requested. An hourly fee in excess of \$500 requires approval by the Chief Compliance Officer.

### **Retirement Plan Consulting**

The fee for Retirement Plan Consulting will generally not exceed 1% of plan assets under management. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of the engagement. The fee-paying arrangement for Retirement Plan Consulting will be outlined in a separate agreement.

### **Third-Party Advisory Services**

The firm is paid by third-party money managers when we refer you to them and you decide to open a managed account. Third-party money managers pay us a portion of the investment advisory fee that they charge you for managing your account. Fees paid to us by third party money manager are generally ongoing. All fees we receive from third party money managers and the written separate disclosures made to you regarding these fees comply with applicable state statutes and rules. The separate written disclosures you need to be provided include: a copy of the third-party money manager's Form ADV 2A, all relevant Brochures, a Solicitation Disclosure Statement detailing the exact fees we are paid and a copy of the third-party money manager's privacy policy. The third-party money managers we recommend will not directly charge you a higher fee than they would have charged without us introducing you to them. Third party money managers establish and maintain their own separate billing processes over which we have no control. In general, they will directly bill you and describe how this works in their separate written disclosure documents.

### **Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than the firm, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian and executing broker/dealer. The fees charged by the firm are separate and distinct from these custodial and execution fees.

In addition, all fees paid to the firm for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of the firm, but would not receive the services designed, among other things, to assist the Client in determining which products or services are most appropriate for each

Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by the firm to fully understand the total fees to be paid. Please refer to "Item 12 – Brokerage Practices" for additional information.

### **Compensation for Sales of Securities**

The firm does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. Clients can however engage investment adviser representatives of the firm in their individual capacity as a registered representative of LPL Financial, a FINRA/SIPC member broker/dealer to render brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage investment adviser representatives in their individual capacity as registered representatives LPL Financial is unaffiliated separate legal entities, not under common control.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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The firm does not charge performance-based fees for its investment advisory services. The fees charged by the firm are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

The firm does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to may recommend or implement any particular investment options to its Clients.

### **Item 7 – Types of Clients**

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The firm offers investment advisory services primarily to corporations, government entities, non-profit organizations and individuals. The number of each type of Client is provided on Form ADV Part 1A. These amounts change over time and are updated at least annually.

### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

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#### **Methods of Analysis**

The firm primarily employs a combination of behavioral, charting, cyclical, fundamental and technical method of analysis in developing investment strategies. Research and analysis from the firm is derived from numerous sources, including financial media companies, third-party research materials, Internet

sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

- **Behavioral Analysis**

Behavioral finance analysis involves an examination of conventional economics as well as behavioral and cognitive psychological factors. Behavioral finance methodology seeks to combine a qualitative and quantitative approach to provide explanations for why individuals may, at times, make irrational financial decisions. Where conventional financial theories have failed to explain certain patterns, the behavioral finance methodology investigates the underlying reasons and biases that cause some people to behave against their best interests. The risks relating to behavior finance analysis are that it relies on spotting trends in human behavior that may not predict future trends.

- **Charting Analysis**

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the firm in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The firm monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

- **Cyclical Analysis**

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that the firm is may recommend or implementing. The risks with cyclical analysis are similar to those of technical analysis.

- **Fundamental Analysis**

Fundamental analysis utilizes economic and business indicators as investment selection criteria. The criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the firm in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The firm monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the firm's review process are included below in "Item 13 – Review of Accounts".

- **Technical Analysis**

Technical analysis involves the analysis of past market data rather than specific company data in determining the may recommend or implementations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary



risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that the firm will be able to accurately predict such a reoccurrence.

As noted above, the firm generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. the firm will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, the firm may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class for portfolio management purposes.

### **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. the firm will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the firm in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The firm monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the firm's review process are included below in "Item 13 – Review of Accounts".

The specific risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The firm will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Below is a list of risks that should be considered prior to investing that may apply to the particular investment held in a particular account. Additional unforeseen risks may apply and affect investment performance. Clients are encouraged to at least consider the following risks:

- **Business Risk** – the measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Call Risk** – the risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.
- **Company Specific Risk** – an unsystemic risk specific to a certain company's operations, executive decisions and reputation which is difficult to quantify
- **Concentration Risk** – concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable

investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.

- **Credit Risk** – the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Currency/Exchange Rate Risk** – the risk of a change in the price of one currency against another.
- **Force Majeure** – a natural and unavoidable catastrophe that interrupts the expected course of events, market structure and access to funds.
- **Interest Rate Risk** – the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Inflationary Risk** – the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- **Legislative Risk** – the risk of a legislative ruling resulting in adverse consequences.
- **Liquidity Risk** – the possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Market Risk** – the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries. This is a risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification
- **Reinvestment Risk** – the risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political Risk** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Terrorism Risk** – an act of terror or calculated use of violence against the country, market structure or individuals.

The firms' methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations.

#### **Types of Investments (Examples, not limitations)**

Investment advisor representatives of the firm allocate a client's assets as appropriate to help them reach their individual investment objectives within their time horizon in a manner consistent with their risk profile. Client funds are allocated appropriately in such investments as listed below:

- **Alternative Investments** – The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.
- **Annuities** – are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy.
  - **Variable Annuities** – If client purchases a variable annuity that is part of the program, client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Client should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts. Variable annuities typically offer:
    - Regular stream of income or a lump sum payout at a future time
    - Tax-deferred treatment of earnings
    - Death benefits

Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges apply if money is withdrawn early. Variable annuities also involve investment risks, like mutual funds.

- **Cash Positions** – Based on a perceived or anticipated market conditions and/or events, certain assets may be taken out of the market and held in a defensive cash position. All cash may be included as assets subject to the agreed upon advisory fee. Other investment types may be included as appropriate for a particular client and their respective trading objectives. the firm, Inc. generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve a reasonable return on our client's cash balances through relatively low-risk conservative investments.
- **Equity** – investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.
- **Exchange Traded Funds (ETFs)** – An ETF is a diversified investment very much like a mutual fund. Mutual funds can be actively managed to beat a benchmark index or designed to replicate the index.

Like mutual funds, shares of an ETF represent a partial ownership of an underlying portfolio of securities. However, unlike mutual funds, shares of an ETF can be traded intraday during market hours.

- **Exchange-Traded Notes (ETNs)** – An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day.
- **Fixed Income** – investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Mutual Funds** – a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
  - **Open-End Mutual Funds** – a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature
  - **Closed-End Mutual Funds** – a type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. To provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
  - **Alternative Strategy Mutual Funds** – Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund’s concentration in the real estate industry.

- **Non-U.S. Securities** – present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.
- **Margin Borrowings** – The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.
- **Regulation D Private Placements** - Under the federal securities laws, any offer or sale of a security must either be registered with the SEC or meet an exemption. Regulation D under the Securities Act provides a number of exemptions from the registration requirements, allowing some companies to offer and sell their securities without having to register the offering with the SEC. However, a "Form D" must be electronically filed with the SEC after they first sell their securities. Form D is a brief notice that includes the names and addresses of the company's promoters, executive officers and directors, and some details about the offering, but contains little other information about the company.
- **Short Sales** - A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.
- **Unit Investment Trust (UIT)** – An investment company that offers a fixed, unmanaged portfolio, generally of stocks and bonds, as redeemable "units" to investors for a specific period. It is designed to provide capital appreciation and/or dividend income. UITs can be resold in the secondary market. A UIT may be either a regulated investment corporation (RIC) or a grantor trust. The former is a corporation in which the investors are joint owners; the latter grants investors proportional ownership in the UIT's underlying securities.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the firm.

#### **Item 9 – Disciplinary Information**

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There are no legal, regulatory or disciplinary events involving the firm or any of its Supervised Persons.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

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Clients may choose to engage an investment advisor representative in their capacity as a registered representative of LPL Financial, a FINRA/SIPC member broker/dealer to implement investment may recommend or implementations on a commission basis.

Investment advisor representatives of the firm are temporarily investment advisor representatives of LPL Financial an unaffiliated SEC registered investment advisor.

- Dual registration is intended for a limited duration while accounts are moved.
- Clients will only pay a single advisory fee during the transition period.
- Once all accounts are moved, investment advisor representatives will no longer be dually registered with more than one registered investment advisor.

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**Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading Code of Ethics**

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The firm has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with the firm (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. The firm and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of the firm’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (866) 379-4015 or through the website at: [www.uretireright.com](http://www.uretireright.com).

**Personal Trading with Material Interest**

the firm allows our Supervised Persons to purchase or sell the same securities that may be may recommend or implemented to and purchased on behalf of Clients. the firm does not act as principal in any transactions. In addition, the firm does not act as the general partner of a fund, or advise an investment company. the firm does not have a material interest in any securities traded in Client accounts.

**Personal Trading in Same Securities as Clients**

the firm allows our Supervised Persons to purchase or sell the same securities that may be may recommend or implemented to and purchased on behalf of Clients. Owning the same securities, we may recommend or implement (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. the firm will require that personal securities trades made by its Supervised Persons be reported the Chief Compliance Officer (“CCO”) for review.

**Personal Trading at Same Time as Client**

While the firm allows our Supervised Persons to purchase or sell the same securities that may be may recommend or implemented to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will the firm or any Supervised Person trade to the detriment of any Client.

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**Item 12 – Brokerage Practices**

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The firm will generally recommend that clients establish a brokerage account with LPL Financial to maintain custody of clients' assets and to effect trades for their accounts. LPL Financial provides brokerage and custodial services to independent investment advisory firms, including the firm. For accounts custodied at LPL Financial, LPL Financial generally is compensated by clients through commissions, trails, or other transaction-based fees for trades that are executed through LPL Financial or that settle into broker/dealer accounts. For IRA accounts, broker/dealer generally charges account maintenance fees. In addition, broker/dealer also charges clients miscellaneous fees and charges, such as account transfer fees. broker/dealer charges The firm an asset-based administration fee for administrative services provided by broker/dealer. Such administration fees are not directly borne by clients, but may be considered when The firm negotiates its advisory fee with clients.

While the broker/dealer does not participate in, or influence the formulation of, the investment advice provided, supervised persons are dually registered with broker/dealer. Dually registered IARs are restricted by certain FINRA rules and policies from maintaining client accounts at another custodian or executing client transactions in such client accounts through any broker/dealer or custodian that is not approved by broker/dealer.

Clients should also be aware that for accounts where broker/dealer serves as the custodian, The firm is limited to offering services and investment vehicles that are approved by broker/dealer, and may be prohibited from offering services and investment vehicles that may be available through other broker/dealers and custodians, some of which may be more suitable for a client's portfolio than the services and investment vehicles offered through broker/dealer.

Clients should understand that not all investment advisers recommend that they custody their accounts and trade through specific broker/dealers.

Clients should also understand that broker/dealer is responsible under FINRA rules for supervising certain business activities of the firm and its Dually Registered Persons that are conducted through broker/dealers and custodians other than LPL Financial. LPL Financial charges a fee for its oversight of activities conducted through these other broker/dealers and custodians. This arrangement presents a conflict of interest because the firm has a financial incentive to recommend that you maintain your account with broker/dealer rather than with another broker/dealer or custodian to avoid incurring the oversight fee.

### **Benefits Received**

The broker/dealer makes available various products and services designed to assist the firm in managing and administering client accounts. Many of these products and services may be used to service all or a substantial number of accounts, including accounts not held with broker/dealer. These services include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade execution (and aggregation and allocation of trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of fees; and assist with back-office functions; recordkeeping and client reporting. broker/dealer also makes available other services intended to help manage and further develop its business. Some of these services assist the firm to better monitor and service program accounts maintained at broker/dealer, however, many of these services benefit only the firm, for example, services that assist with growing its business. These support services and/or products may be provided without cost, at a discount, and/or at a negotiated rate, and include practice management-related publications; consulting services; attendance at conferences and seminars, meetings, and other educational and/or

social events; marketing support; and other products and services used in furtherance of the operation and development of its investment advisory business.

Where such services are provided by a third-party vendor, broker/dealer will either make a payment to the firm to cover the cost of such services, reimburse for the cost associated with the services, or pay the third-party vendor directly on behalf of the firm.

The products and services described above are provided as part of its overall relationship with LPL Financial. While as a fiduciary, The firm endeavors to act in its clients' best interests, the receipt of these benefits creates a conflict of interest because The firm' recommendation that clients custody their assets at the custodian based, in part, on the benefits and of the foregoing products and services and not solely on the nature, cost or quality of custody or brokerage services provided.

### **Best Execution**

Although the commissions and/or transaction fees paid by our clients generally comply with our duty to obtain best execution, you may pay a commission that is higher than what another qualified broker-dealer might charge to affect the same transaction when we determine, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services we receive.

In seeking best execution, the determining factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client transactions. The brokerage commissions or transaction fees charged by the broker-dealer/custodian are exclusive of, and in addition to, our investment management fee. Our best execution responsibility is qualified if the securities we purchase are mutual funds that are traded at net asset value as determined at the daily market close.

### **Aggregation & Allocation of Transactions**

Although each client's portfolio accounts are individually managed, we may purchase or sell the same securities at the same time for multiple clients. When this occurs, it is often advantageous to aggregate the securities of multiple clients into one trading block for execution. If your portfolio securities are purchased or sold in an aggregated transaction with the securities of other clients, you will all receive the same execution price, and if the aggregated purchase or sale involves several executions to complete the transaction, you will all receive the average price paid or received on the aggregated transaction.

However, if an aggregated transaction results in only a partial execution and the equal allocation of the partial execution amongst multiple clients would result in an inefficient trading unit in client portfolios, we reserve the right to allocate the transaction to specific individual clients on an equitable rotational basis so that over time no client is disadvantaged in the management of its portfolio.

### **Directed Brokerage**

The firm does not accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker/dealer, and the firm would not seek better execution services or prices from other broker/dealers or be able to "aggregate" the client's transactions for execution with orders for other accounts managed by RetireRight. As a



result, the client requesting directed brokerage may pay higher commissions or other transaction costs, greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

### **Soft Dollars**

Soft dollars are revenue programs offered by broker/dealers whereby an advisor enters into an agreement to place security trades in exchange for research and other services.

The firm receives support services without cost, at a discount, and/or at a negotiated rate, that include such things as research reports or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making.

These support services are provided based on the overall relationship without a minimum production level or value of assets held with the custodian. Consequently, it is not the result of soft dollar arrangements or any other express arrangements that involves the execution of client transactions as a condition to the receipt of services.

## **Item 13 – Review of Accounts**

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### **Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Gromis as the Chief Compliance Officer. The surveillance process focuses on accounts that have potential issues in the following areas:

- Market Performance
- Trading Inactivity
- High Cash Balance
- Position Concentration
- Asset Allocation
- Risk Tolerance
- Senior Suitability

### **Causes for Reviews**

In addition to the investment monitoring noted above, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify the firm if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

## **Item 14 – Client Referrals and Other Compensation**

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## **LPL Financial, LLC**

The firm receives an economic benefit in the form of reimbursement for marketing related expenses. Please see detailed discussion of the categories of marketing related expenses and potential conflicts of interest in Item 12 Brokerage Practices.

The firm and employees may receive additional compensation from product sponsors. However, such compensation may not be tied to the sale of products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with investment advisor representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients. Product sponsors may also pay for, or reimburse RIA for the costs associated with, education or training events that may be attended by RIA employees and investment advisor representatives and for RIA sponsored conferences and events.

### **Client Referrals from Solicitors**

The firm does not engage individual solicitors for Client referrals. However, there is a portion of revenue that is shared with Premier Bank for clients that are derived from their field of Membership.

## **Item 15 – Custody**

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RIA does not have custody of client funds or securities. All clients receive at least quarterly account statements directly from the qualified custodian. Upon opening an account with a qualified custodian on a client's behalf, the firm will promptly notify the client in writing of the qualified custodian's contact information. If we decide to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm.

- Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

## **Item 16 – Investment Discretion**

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Client can determine to engage the firm to provide investment advisory services on a discretionary basis. Discretion includes the authority to determine the securities to be bought or sold and well as the amount. Prior to the firm assuming discretionary authority over a client's account, the client shall be required to execute a written agreement, granting the firm full or limited authority to buy, sell, or otherwise effect transactions.

## **Item 17 – Voting Client Securities**

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The firm does not vote client proxies, but third-party money managers selected or recommended by our firm may vote proxies for clients. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Except in the event a third-party money manager votes proxies, clients maintain exclusive responsibility for:

- directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and,
- making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

**Item 18 – Financial Information**

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Neither the firm, nor its management, have any adverse financial situations that would reasonably impair their ability to meet all obligations to its Clients.

- Neither the firm, nor any of its the control persons, has been subject to a bankruptcy or financial compromise.
- The firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

## Item 1 – Cover Page

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Registered As: RetireRight, LLC | Doing Business as: RetireRight Consulting Group



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### **Appendix 1 – RetireRight Wrap Fee Program Brochure**

**March 26, 2020**

This Form ADV2A - Appendix 1 ("Wrap Fee Brochure") provides information about the qualifications and business practices for the firm ("the firm" or the "the firm") services when offering services pursuant to a wrap program. This Wrap Fee Brochure shall always be accompanied by the the firm Disclosure Brochure, which provides complete details on the business practices of the the firm. If you did not receive the complete the firm Disclosure Brochure or you have any questions about the contents of this Wrap Fee Brochure or the the firm Disclosure Brochure, please contact us at (866) 379-4015 or through the firm's web site: [www.uretireright.com](http://www.uretireright.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about the firm and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD No. 300925.

Registration does not imply a certain level of skill or training

## **Item 2 - Material Changes**

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If the firm amends this brochure so that it contains material changes from the last annual update, the changes will be identified in this item.

There were no material changes to this brochure since the last date of publication.

Clients will receive, at no charge, a summary of any material changes within 120 days of the firm's fiscal year end and promptly (generally within 30 days) after any material changes throughout the year.

**Item 3 – Table of Contents**

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#### **Item 4 – Services, Fees and compensation**

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The firm provides investment advisory services where the asset management fee and ticket charges are “wrapped” into a single fee. This Wrap Fee Program Brochure is provided as a supplement to the the firm Disclosure Brochure (Form ADV 2A) to provide further details of the business practices and fee structure.

This Wrap Fee Program Brochure references back to the the firm Form ADV 2A in which this Wrap Fee Program Brochure serves as an Appendix. Please see Item 4 – Advisory Services of the Form ADV 2A for details on the firm’s investment philosophy and related services.

The firm is the sponsor and portfolio manager of this Wrap Fee Program, receives investment advisory fees paid by clients and pays the Custodian for the costs associated with the normal trading activity.

Fees are based on the market value of assets under management at the end of the prior calendar month or quarter or the daily average as agreed in the advisory agreement. Investment advisory fees are based on the scope and complexity of an account the degree of expertise required and the amount or time required but generally do not exceed an annualized rate of 1.5%.

Participation in this wrap fee program may cost more or less than purchasing such services separately.

#### **Item 5 – Account Requirements and Types of Clients**

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Please see Item 7 – Types of Clients in the Form ADV 2A Disclosure Brochure.

#### **Item 6 - Portfolio Manager Selection and Evaluation**

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The firm serves as sponsor and portfolio manager for the services under this Wrap Fee Program. the firm does not charge performance-based fees.

The firm does not accept proxy-voting responsibility. Clients will receive proxy statements directly from the Custodian. the firm can assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### **Item 7 – Client Information Provided to Portfolio Managers**

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The firm is the sponsor and sole portfolio manager for the Program. There is no other portfolio manager where client information can be shared.

#### **Item 8 – Client Contact with Portfolio Managers**

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The firm is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at the firm.

#### **Item 9 – Additional Information**

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The backgrounds, disciplinary information (none) and other financial industry activities and affiliations is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD No. 300925 as well as Items 10 and 14 of the Form ADV Part 2A.

Please also see Item 9 of the the firm Disclosure Brochure as well as Item 3 of each Investment the firm Representatives Form ADV 2B Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background information.

The firm has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The details of the the firm Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

Client accounts are monitored on a regular and continuous basis by the firm under the supervision of the Chief Compliance Officer (“CCO”). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Brochure) for details on additional compensation that may be received by the firm or its Investment the firm Representatives. Each IAR’s Form ADV 2B Brochure Supplement (also included with this Wrap Fee Brochure) provides details on any outside business activities and the associated compensation.

- The firm does not pay a referral fee for the introduction of clients.
- Financial information is available in Item 18 of the Form ADV Part 2A – Disclosure Brochure.



Registered As: RetireRight, LLC | Doing Business as: RetireRight Consulting Group



1200 Valley West Drive – Suite 707  
West Des Moines, Iowa 50266  
Phone: (866) 379-4015  
[www.uretireright.com](http://www.uretireright.com)

# Brian R. Ormord

1797 Creek Wood Dr.  
Dubuque, IA 52003  
563-876-3023

March 26, 2020,

This brochure supplement provides information about your Investment the firm Representative that supplements the RetireRight, LLC disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through RetireRight, LLC an investment advisor firm. Please contact RetireRight, LLC at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment the firm Representative is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

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This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

**Brian R. Ormord**

Year of birth: **1969**

### **Education**

The following information details your Financial the firm's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial the firm attended the institution but did not attain a degree.

Grand View College; Bachelor's Degree 09/01/1992 - 05/01/1995  
University of Northern Iowa; 09/01/1988 - 12/31/1990

### **Professional Designations**

The following provides information on professional designation(s) that your Financial the firm earned.

#### Professional Plan Consultant™ - PPC™ 09/2013

Issuing Organization: Financial Service Standards. Prerequisites/Experience Required: 3 years of financial industry experience. Educational Requirements: Online (approximately 10 hours) or 2-day classroom (approximately 16 hours) 401k Service Training Program and must pass a final exam. Continuing Education: 6 hours per year.

#### Accredited Investment Fiduciary® - AIF® 09/2005

Issuing Organization: Center for Fiduciary Studies. Prerequisites/Experience Required: Candidate must meet a point-based threshold based on a combination of education, relevant industry experience and/or professional development. Educational Requirements: Candidate must complete one of the following: Web-based program or Capstone program. Continuing Education: 6 hours per year

#### Chartered Retirement Plans Specialist® - CRPS® 07/2004

Issuing Organization: College for Financial Planning. Prerequisites/Experience Required: None. Educational Requirements: Self-study course (11 topics requiring approximately 45 hours) and pass final exam. Continuing Education: 16 hours and reaffirmation of The College for Financial Planning's Standards of Professional Conduct every 2 years.

### **Business Experience**

The following information details your Financial the firm's business experience for at least the past 5 years.

RetireRight, LLC; Investment Advisor Representative  
02/2019 – PRESENT

Premier Bank; Financial Consultant  
01/2010 – PRESENT

LPL Financial LLC; Registered Representative  
09/2004 – 12/31/19

### **Item 3 - Disciplinary Information**

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This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Item 4 - Other Business Activities**

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This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

#### **Insurance Licensed Registered Representative**

Mr. Ormord is a registered representative of LPL Financial and receives commissions and other types of compensation for the sale of securities. He also sells insurance and receives commissions for insurance product sales. The receipt of commissions gives a broker an incentive to recommend investment and/or insurance products based on the compensation received, rather than on the client's needs. However, he may only recommend securities and insurance products that he believes are in a client's best interests. Please ask any questions regarding the compensation received. Clients are under no obligation to purchase investment products or insurance through Mr. Ormord.

#### **Employed by a Bank**

Mr. Ormord is also an employee of a financial institution (i.e. bank or credit union) and provides advisory services to customers of the financial institution. These services are offered pursuant to an agreement with the financial institution. He can receive compensation in his role as an employee of the Bank that is distinct from the advisory services provided by RetireRight, LLC. Investment products and services are not FDIC insured, are not obligations of the financial institution, are not endorsed, recommended or guaranteed by the financial institution.

### **Item 5 - Additional Compensation**

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This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mr. Ormord has additional business activities that are detailed in Item 4 above.

### **Item 6 - Supervision**

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This section explains how RetireRight, LLC supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

RetireRight, LLC maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Richard Gromis serves as the Chief Compliance Officer and is responsible for administering the policies and procedures and a system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements.

Registered As: RetireRight, LLC | Doing Business as: RetireRight Consulting Group



# Henry (Dan) Kinney

1200 Valley West Drive – Suite 707  
West Des Moines, Iowa 50266  
Phone: (866) 379-4015  
[www.uretireright.com](http://www.uretireright.com)

**March 26, 2020**

This brochure supplement provides information about your Investment the firm Representative that supplements the RetireRight, LLC disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through RetireRight, LLC an investment advisor firm. Please contact RetireRight, LLC at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment the firm Representative is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

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This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

**Henry (Dan) Kinney**

Year of birth: **1963**

### **Education**

The following information details your Financial the firm's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial the firm attended the institution but did not attain a degree.

University of Iowa; BGS, 08/01/1984 - 12/20/1986

New Mexico Military Institute; AA, 08/01/1982 - 05/12/1984

### **Professional Designations**

The following provides information on professional designation(s) that your Financial the firm earned.

**Accredited Investment Fiduciary® - AIF® Center for Fiduciary Studies 09/2005**

Issuing Organization: Center for Fiduciary Studies. Prerequisites/Experience Required: Candidate must meet a point-based threshold based on a combination of education, relevant industry experience and/or professional development. Educational Requirements: Candidate must complete one of the following: Web-based program or Capstone program. Continuing Education: 6 hours per year

### **Business Experience**

The following information details your Financial the firm's business experience for at least the past 5 years.

RetireRight, LLC – Investment Advisor Representative  
02/2019 – PRESENT

LPL Financial LLC; Investment Advisor Representative  
07/1998 – 12/31/19

## **Item 3 - Disciplinary Information**

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This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 4 - Other Business Activities**

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This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in

any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

#### **Insurance Licensed Registered Representative**

Mr. Kinney is a registered representative of LPL Financial and receives commissions and other types of compensation for the sale of securities. He also sells insurance and receives commissions for insurance product sales. The receipt of commissions gives a broker an incentive to recommend investment and/or insurance products based on the compensation received, rather than on the client's needs. However, he may only recommend securities and insurance products that he believes are in a client's best interests. Please ask any questions regarding the compensation received. Clients are under no obligation to purchase investment products or insurance through RetireRight, LLC.

#### **Item 5 - Additional Compensation**

---

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mr. Kinney has additional business activities that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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This section explains how RetireRight, LLC supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

RetireRight, LLC maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Richard Gromis serves as the Chief Compliance Officer and is responsible for administering the policies and procedures and a system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements

Registered As: RetireRight, LLC | Doing Business as: RetireRight Consulting Group



# Dirk M. Dixon

1200 Valley West Drive – Suite 707  
West Des Moines, Iowa 50266  
Phone: (866) 379-4015  
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**March 26, 2020**

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## **Item 2 - Educational Background and Business Experience**

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This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

**Dirk M. Dixon**

Year of birth: **1971**

### **Education**

The following information details your Financial the firm's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial the firm attended the institution but did not attain a degree.

Grand View University; Bachelors of Business Administration  
09/01/1995 - 05/01/1997

### **Professional Designations**

The following provides information on professional designation(s) that your Financial the firm earned.

#### **Accredited Investment Fiduciary® - AIF® 12/2014**

Issuing Organization: Center for Fiduciary Studies. Prerequisites/Experience Required: Candidate must meet a point-based threshold based on a combination of education, relevant industry experience and/or professional development. Educational Requirements: Candidate must complete one of the following: Web-based program or Capstone program. Continuing Education: 6 hours per year.

#### **Enrolled Agent – EA 06/2009**

The Enrolled Agent is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels—examination, collection, and appeals—of the Internal Revenue Service. It is recognized in the United States for its:

- (1) code of conduct and standards of practice; and,
- (2) ethical requirements that govern professional engagements with clients.

To attain the right to use the Enrolled Agent designation, an individual must meet the following requirements:

**Examination** – Pass the three-part series of exams that cover a comprehensive set of tax rules, procedures, and application. The Special Enrollment Exam (SEE) is divided into three stand-alone exams. Part 1 covers Individuals, Part 2 covers Businesses, and Part 3 includes Representation, Practices and Procedures.

**Continuing Education** – Complete 72 hours of continuing education hours every three years, including six hours of ethics; and

**Compliance** – Renew an agreement to be bound by the U.S. Department of the Treasury – attesting to comply, both personally and professionally, with the U.S. tax code.

## **Business Experience**

The following information details your Financial the firm's business experience for at least the past 5 years.

RetireRight, LLC; Investment Advisor Representative  
11/2018 – PRESENT

LPL Financial, LLC; Financial Advisor  
08/2012 – 12/31/19

Baker & Associates LLP; Licensed Public Accountant and Enrolled Agent  
06/2007 - 05/2015

Aviva USA Corporation; Agent  
08/2005 - 09/2012

Ameritas Investment Corp; Registered Representative  
08/2005 - 09/2012

Dirk Dixon; sole proprietor  
08/2005 - 09/2012

Central Financial Group; Agent/Employee  
08/2006 - 09/2012

## **Item 3 - Disciplinary Information**

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## **Item 4 - Other Business Activities**

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This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

### **Insurance Licensed Registered Representative**

Mr. Dixon is a registered representative of LPL Financial and receives commissions and other types of compensation for the sale of securities. He also sells insurance and receives commissions for insurance product sales. The receipt of commissions gives a broker an incentive to recommend investment and/or insurance products based on the compensation received, rather than on the client's needs. However, he may only recommend securities and insurance products that he

believes are in a client's best interests. Please ask any questions regarding the compensation received. Clients are under no obligation to purchase investment products or insurance through Mr. Dixon.

#### **Item 5 - Additional Compensation**

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This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mr. Dixon has additional business activities that are detailed in Item 4 above.

#### **Item 6 - Supervision**

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RetireRight, LLC maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Richard Gromis serves as the Chief Compliance Officer and is responsible for administering the policies and procedures and a system of technology-based controls to monitor account activity for irregularities or patterns that require review and potential action that may lead to disciplinary action or reimbursements

## Privacy Policy

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Effective: March 26, 2020

### Our Commitment to You

The firm is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment the firm, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. the firm (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

The firm does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment the firms (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> The firm does disclose, and does intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Shadow Wealth Management or the client has a formal agreement with the financial institution.	Yes	Yes
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> The firm does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (866) 379-4015 or through the website at: [www.uretireright.com](http://www.uretireright.com).